

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**HILLTOP CHURCH OF THE
NAZARENE,**

Plaintiff,

v.

**CHURCH MUTUAL INSURANCE
COMPANY,**

Defendant.

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CIVIL ACTION NO. 6:21-CV-00322-JCB

AGREED MOTION TO EXTEND EXPERT DEADLINES

COMES NOW Plaintiff Hilltop Church of the Nazarene, who respectfully moves the Court to enter an order extending the Parties' expert deadlines in this matter pursuant to the Court's Local Rules and agreement of the Parties, and respectfully states:

I. OVERVIEW

The Court entered a Scheduling Order on October 13, 2021, which set out the expert deadlines. Dkt. 8. Plaintiff requested that Defendant agree to extend the Parties' respective expert disclosure deadlines by twenty-two (22) days, and Defendant advised that it did not object to the extension. Plaintiff therefore requests that the Court extend expert designation deadlines by twenty-two (22) days for both Plaintiff and Defendant. The original date for Initial Expert Designation and Report was February 7, 2022, the new agreed date is March 1, 2022. The original date for Responsive Designations was March 7, 2022 and the new agreed date is March 31, 2022. Per the Scheduling Order, the rebuttal expert deadlines will follow 30 days after report deadlines. No other deadlines would be affected by this extension.

II. GROUNDS FOR EXTENSION OF DEADLINES

Plaintiff requests this continuance to allow its experts additional time to complete reports in light of current caseloads and scheduling issues. This is the first request for an extension of any deadline in the Scheduling Order, and is not requested for the purposes of delay, but so that the Parties' experts will have adequate time to complete their respective analyses. This extension will not delay the case's progress or affect any other deadline in the Scheduling Order. To that end, the Parties are continuing to conduct discovery, including the taking of witness depositions and the exchange of written discovery.

III. REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court extend the expert deadlines by twenty-two (22) days.

/s/ Vincent P. Circelli

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CERTIFICATE OF CONFERENCE

On February 1, 2022, I conferred with Brian Odom and Lindsey Bruning, attorneys for Defendant, and they agree to the contents of this Motion to Extend Expert Deadlines.

/s/ Vincent P. Circelli
Vincent P. Circelli

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to counsel of record in accordance with the Federal Rule of Civil Procedure, on February 9, 2022, via the Court's electronic filing system.

via e-service

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G. Brian Odom
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/s/ Vincent P. Circelli
Vincent P. Circelli